

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

OCT 21 2022

CLERK U.S. DISTRICT COURT
By: _____
Deputy

UNITED STATES OF AMERICA

v.

No. 4:22-MJ-866

RANDALL ALLAN TAYLOR (01)
MELINDA LEE LAKINS (02)

CRIMINAL COMPLAINT

Conspiracy to Possess a Controlled Substance with Intent to Distribute
(Violation of 21 U.S.C. § 846)

Beginning in or before July 2022 and continuing until in and around October 2022, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Randall Allan Taylor** and **Melinda Lee Lakins**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) & (b)(1)(B)).

I, Justin Grissom, a Special Agent with the Texas Department of Public Safety (DPS), being duly sworn, deposes and states:

1. I, Special Agent Justin Grissom, am a full-time certified peace officer with the Texas Department of Public Safety and have been so employed for approximately 5 years. I have been assigned to the Criminal Investigations Division (CID) since March 15, 2022. Prior to being assigned to CID, I was a Texas Highway Patrol Trooper. I hold an Advance peace officer's license from the Texas Commission on Law Enforcement (TCOLE).

I have participated in both open and covert surveillance including conventional as well as electronic surveillance. I have received extensive training with electronic surveillance. I have significant experience locating and arresting federal, state and local fugitives. I have experience investigating violations of the Texas Health and Safety Code, including but not limited to, the procurement and execution of search warrants, interviewing and working with confidential informants, conducting undercover operations, and the detection and identification of various narcotics and other dangerous drugs. I have assisted and lead investigations involving violations of the Controlled Substances Act Title 21 U.S.C. These investigations have led to successful federal indictments and convictions.

2. I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7); that is, I am an officer of the United States who is authorized by law to conduct investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516.

3. Because this affidavit is offered for the limited purposes of supporting a criminal complaint charging **RANDALL ALLAN TAYLOR** and **MELINDA LEE LAKINS** with a violation of 21 U.S.C. §846, conspiracy to possess with intent to distribute of a controlled substance - methamphetamine, a Schedule II controlled substance, as well as violations of law, it does not include all facts known to me regarding this investigation.

PROBABLE CAUSE

4. In July of 2022, DPS Agents initiated an investigation involving two confirmed members of various white supremacist prison gangs including the Aryan Brotherhood of Texas (ABT) and Featherwoods. A confidential informant (CI) as well as numerous law enforcement officers advised me that Randall Taylor and Melinda Lakins were distributing large quantities of methamphetamine from XXXX Harwell Street, Apartment 10, White Settlement, Tarrant County, Texas.

5. In August of 2022, Special Agent Grissom (Affiant) alongside other DPS CID Special Agents and a Cooperating Individual (CI) conducted an evidence purchase of methamphetamine from Randall Taylor and Melinda Lakins at their residence. The CI was searched before and after the evidence purchase. Special Agents purchased a distributable quantity of fifty-two (52) grams of methamphetamine. The methamphetamine field tested positive.

6. In September of 2022, Special Agent Grissom (Affiant) alongside other DPS CID Special Agents and a Cooperating Individual (CI) conducted an evidence purchase of methamphetamine from Randall Taylor and Melinda Lakins at their residence. The CI was searched before and after evidence purchase. Special Agents purchased a distributable quantity of one hundred twenty-four (124) grams of methamphetamine.

The methamphetamine field tested positive. Taylor and Lakins were both present during the transaction.

7. In September of 2022, Special Agent Grissom (Affiant) alongside other DPS CID Special Agents and a Cooperating Individual (CI) conducted an evidence purchase of methamphetamine from Randall Taylor and Melinda Lakins at their residence. The CI was searched before and after the evidence purchase. Special Agents purchased a distributable quantity of one hundred fourteen (114) grams of methamphetamine. The methamphetamine field tested positive. Taylor and Lakin were both present during the transaction.

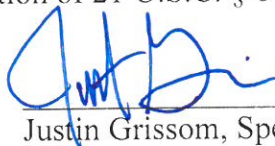
8. On October 1, 2022, Special Agent Grissom (Affiant), other Special Agents and Texas DPS Troopers conducted a surveillance/ traffic stop operation in the area of Taylor and Lakins residence. A vehicle was observed arriving and leaving the residence after a short amount of time. Special Agents followed the vehicle until Troopers could conduct a lawful traffic stop. After the lawful traffic stop and a probable cause vehicle search, methamphetamine was located. The driver made a statement against penal interest to Affiant in an interview that the methamphetamine was purchased from Taylor and Lakins. The driver informed Affiant that the driver had purchased methamphetamine from Taylor and Lakins approximately five (5) times in the last six (6) months.

A distributable quantity of twenty-nine (29) grams of suspected methamphetamine was seized from the stop.

9. On October 20, 2022, Special Agent Grissom along with numerous Special Agents executed a search warrant on the residence of Randall Taylor and Melinda Lakins located at XXXX Harwell Street, Apt 10, White Settlement, Tarrant County, Texas. During the execution of the search warrant, several boxes of rifle and pistol ammunition was located inside the master bedroom near Taylor's belonging. Taylor and Lakins are both convicted felons and have both served Federal BOP time. Also located inside the master bedroom was packages of syringes, methamphetamine residue and several methamphetamine pipes.

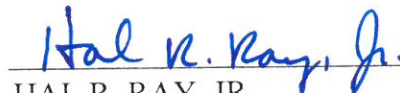
CONCLUSION

10. Based on the foregoing facts, probable cause exists to believe that **Randall Allan Taylor** and **Melinda Lee Lakins**, did knowingly conspire to possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 846.



Justin Grissom, Special Agent
Texas Department of Public Safety

Subscribed and sworn to before me on this the 21st day of October, 2022 at 10:27 a.m., in Fort Worth, Texas.



HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE